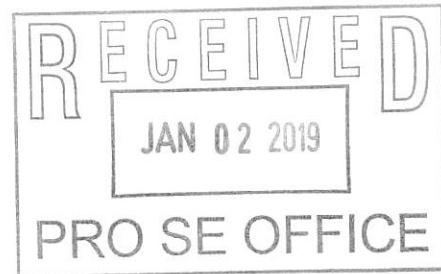


December 26, 2018

U.S. Magistrate Allyne Ross(ARR)
U.S. Magistrate Steven Tiscione(ST)

Pro/Se Office
Reference: civil entry CV-15-3462(ARR)
SILVER vs. CITY of NEW YORK POLICE DEPARTMENT
JAQUELINE SILVER vs. VICTOR and SUSAN WORTMAN



Dear Magistrates,

On Thursday, December 13th and 15th respectively, VICTOR and SUSAN WORTMAN received harassing written communication from MS. JAQUELINE SILVER. In doing so she has, once again, violated the Order of Protection dated April 11, 2018 – April 11, 2019. Mine was delivered by mail, Victor's was delivered by a man at our front door.

We are feeling vulnerable that she will again begin stalking us day and night. We have seen her in her car parked on the street and, in the neighborhood shopping center. I naively assumed it was coincidence. Her disturbing behavior continues to cause great strain. Victor has Parkinson's Disease, stress severely exasperates the symptoms. I am equally concerned that, similar communication will be sent to my children. This has been Ms. Silver's pattern in the past.

I am aware that she has a court appearance January 10th. I appeal to the court to consider the seriousness of this matter. Surely, this justifies the court's attention.

Feel free to contact me if I can be of any assistance. Personal contact information is excluded from this letter. I want to avoid Ms. Silver obtaining recently changed phone numbers and, email addresses. Everything can be provided upon request by the proper authorities.

Thanking you in advance –

Susan Wortman

Cc: ADA Shivani Sharma
Detective Michael Galgano (109th Precinct)

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

JACQUELINE SILVER

2186/2018

-Plaintiff-

--against—

SUSAN WORTMAN , VICTOR WORTMAN

--Defendants—

**AFFIDAVIT OF SERVICE
INITIATING PAPERS**

State of New York) ss:
County of Kings)

Craig Gottlieb, being duly sworn, disposes and says:

I am not a party to the action and I am over the age of 18
and reside in Douglaston, Queens.

On 2018, I served Plaintiffs Summons With Notice ,
And Letter Regarding Notice to Queens Criminal Court,
Defense Counsel and Queens District Attorneys Office ,
upon Wortman, at in the am . I served the within

papers at 212-02 16th Avenue in Bayside Queens.

Sworn to before me this day
of

Notary Public

Craig Gottlieb



Forever U.S.A.

Hector Belenes Monterrey

212-52 16th Ave
Bayville, NY 11361

11360-152502

2186/2018 ***Order Granting Poor Person Status*** granted on Friday November 09, 2018 filed 11/9/2018

2186/2018 Summons wholice filed 8/30/2018

Page 13 of 14

Page 1 of 2

RECEIVED
KINGS COUNTY CLERK

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

X

Index No. 2186/18

Jacqueline Silver

Plaintiff

SUMMONS WITH NOTICE
Revised

Plaintiff designates
Kings County as the
place of trial

The basis of venue is
where action occurred.

-against-

SUSAN WORTMAN
HNB

Victor Wortman Defendants

To the Person (s) Named as Defendant(s) above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or if the complaint is not served with the summons, to serve a notice of appearance on the plaintiff, Ms. Silver within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York) and in case of your failure to appear or answer judgment, will be taken against you by default for the relief demanded in the complaint.

Dated: Great Neck , NY
August 30th , 2018

Jacqueline Silver
Pro Se Plaintiff
P.O. Box 604726
Bayside, NY 11360

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

JACQUELINE SILVER

2186/2018

-Plaintiff-

--against--

SUSAN WORTMAN , VICTOR WORTMAN

--Defendants--

December 8, 2018

To Whom It May Concern,

I spoke to my defense attorney Mr. Harding on multiple occasions the last being the last court date of December 4th. I made him aware that legal papers were going to be served by a non interested party to the Wortmans in the above referenced action, I also told him that it needs to be served before the 120 days from the filing of the index number, which would expire at the end of December.

Mr. Harding told me as long as I go nowhere near the Wortmans I won't get arrested again for violating an order of protection. The despicable actions of the Wortmans in my civil case in United States District Court led me with no choice then to file this lawsuit. On December 4th, Mr. Harding informed the court on the record that the papers will be served on the Wortmans. The judge cut him short, but enough was said for the Assistant District attorney and the court to be made aware that the papers will be served . I also tried to contact the ADA to ask for a modification on the order of protections, but they never got back to me.

Best Jacqueline Silver

This action stems from a subpoena that was served on them back in December 26, 2016, to produce documents to the above P.O. Box for an action I had in Brooklyn Federal Court. On August 30th, 2017 Mr. and Mrs. Wortman went under oath via telephone and purposely and with malice defamed me, put me in a false light/ invaded my privacy, harassed me and lied to the magistrate about me and with intent and malice. This action is for torts against my person. Mr. Wortman on multiple occasions has told me that he has my documents in his possession that I could use for my case in Brooklyn . Mrs. Wortman has gone under oath on the phone and in person and said , and in her exact words, " Ms. Silver, I looked in the house and can't find them, their either in his car or the Bay Terrace Jewish Center."

After an over an hour phone conversation I had with Mrs. Wortman the day after mothers' day in 2017, regarding the subpoena, (which as the issuer of a subpoena I tried not communicating with her)she called me over six times in a matter of a couple of days for no reason at all . One of the voicemails that she left me stated that she thought we had a great conversation , and that this wasn't for her but she will have to get an attorney. Besides the fact that she called on restricted, I didn't call her back as there was no reason to as I am the issuer of the subpoena. I also texted Victor to tell him that if she wants to talk to me to unblock her number or she needs to stop calling me. I told him that I am trying to serve my legal papers and that she was harassing me. She continued to call me after she told me that this wasn't for her, she is a goody two shoes and an honest person. She then proceeded to leave me voicemails that she couldn't sleep last night . She said she doesn't care what I say to her husband, she doesn't care what relationship I had with Victor or continue to have with Victor , she doesn't have my medical records take it up with Victor. She thought everything was good with us , she doesn't get it , and I fooled her.

She left me another voice mail that she is sorry to bother me again, the only thing she could think of was the horrible things that Victor said to me , she thought we were truthful with each other. She wanted me to explain to her if there was anything that Victor said that got me upset and if I don't answer the phone she will know that I don't want to talk about it .

She called again the next day after she told me she wouldn't bother me again. These voicemails had no purpose, were irrelevant and had no bearing on a subpoena that was served on the Wortmans. Mrs. Wortman strictly did this out of malice. At this point Silver was being harassed for no reason at all. Ten days later, Mrs. Wortman wrote a letter to the judges on my case filled with lies, defamation, invasion of privacy, up to and including false light, public disclosure of private facts, and intrusion of solitude. Their was also accusations of yelling at her while Mr. Gottlieb served her the papers. This letter was done maliciously and filled with false allegations and accusations against plaintiff Silver

Defendants Victor and Susan Wortman , willfully, maliciously and deliberately engaged in the aforesaid conduct without any justification, reason or provocation. The last occurrence being August 30th, 2017. This behavior that was inflicted on plaintiff Silver stemmed for over a period of four years. Mr. and Mrs. Wortman used the subpoena that was served on them back in 2016 to get into the United States District Court. Ms. Silver has a constitutional right to issue a subpoena if she believes that the subpoena for documents is relevant to the case. Ms. Silver was deprived of her rights. Ms. Silver also has Mr. Wortman on an MP3 player admitting that he has documents relevant to the case.

AMENDED -NEW NATURE OF ACTION DELETED TORT OF INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS AND ADDED INTRUSION OF SOLITUDE

NOTICE : THE NATURE OF THIS ACTION IS AS FOLLOWS:

HARASSMENT/FOLLOWING PLAINTIFF , INVASION OF PRIVACY/FALSE LIGHT, INTRUSION OF SOLITUDE, DEFAMATION/LIBEL AND SLANDER , AND ASSAULT/THREATS . With the last occurrence on or about August 30, 2017.

THE RELIEF SOUGHT IS AS FOLLOWS: Judgment against each and every defendant in a sum that exceeds the jurisdiction of all lower courts , with court fees and other disbursements and such relief as just and proper.

UPON YOUR FAILURE TO APPEAR: Judgment will be taken against you by default with interest from August 30, 2017 and the cost of this action . This judgment should exceed the jurisdiction off all lower courts.

Defendants

Susan Melanie Wortman
212-02 16th Avenue
Bayside, NY 11360

Victor Wortman
212-02 16th Avenue
Bayside, NY 11360